

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MASSTECH COMMUNICATIONS, INC.,

Plaintiff,

v.

ROBERT CURRAN,

Defendant.

MAR 29 P 1:33

U.S. DISTRICT COURT
DISTRICT OF MASS

CIVIL ACTION
NO.

04 CV 10604 NG

PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER

Pursuant to Mass. R. Civ. P. 65, plaintiff MassTech Communications, Inc. ("MTC") hereby moves this Court to enter the proposed Temporary Restraining order filed herewith and thereby enjoin the defendant, Robert Curran ("Curran") as follows:

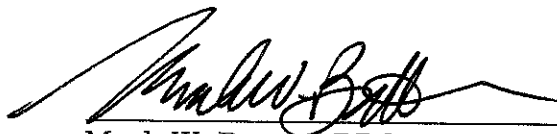
- (a) from further use or dissemination of any database, customer list, or other confidential information and/or trade secrets of MTC;
- (b) from removing, destroying, or otherwise altering any computers or data storage devices in Curran's possession, custody, or control;
- (c) from direct or indirect competition with MTC and/or solicitation of MTC's customers and contacts.

In support of its motion, plaintiff relies on the Verified Complaint and Memorandum of Law filed herewith.

Respectfully Submitted,

**MASSTECH COMMUNICATIONS,
INC.**

By its attorneys,

A handwritten signature in black ink, appearing to read "Mark W. Batten", is written over a horizontal line.

Mark W. Batten, BBO #566211
BINGHAM McCUTCHEN LLP
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Dated: March 29, 2004